

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

VWS Holdco, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10979 (JKS)

Jointly Administered

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON JULY 31, 2025 at 1:00 P.M. (ET)**

THIS PROCEEDING WILL BE CONDUCTED IN-PERSON. ALL COUNSEL AND WITNESSES ARE EXPECTED TO ATTEND UNLESS PERMITTED TO APPEAR REMOTELY VIA ZOOM. PLEASE REFER TO JUDGE STICKLES' CHAMBERS PROCEDURES ([HTTPS://WWW.DEB.USCOURTS.GOV/CONTENT/JUDGE-J-KATE-STICKLES](https://www.deb.uscourts.gov/content/judge-j-kate-stickles)) AND THE COURT'S WEBSITE ([HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)) FOR INFORMATION ON WHO MAY PARTICIPATE REMOTELY, THE METHOD OF ALLOWED PARTICIPATION (VIDEO OR AUDIO), JUDGE STICKLES' EXPECTATIONS OF REMOTE PARTICIPANTS, AND THE ADVANCE REGISTRATION REQUIREMENTS.

REGISTRATION IS REQUIRED BY 4:00 P.M. (PREVAILING EASTERN TIME) THE BUSINESS DAY BEFORE THE HEARING UNLESS OTHERWISE NOTICED USING THE ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE [HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)

ADJOURNED MATTERS:

1. Motion for Entry of an Order (I) Authorizing the Rejection of Executory Contract with Swift Creek Renewables, LLC and (II) Granting Related Relief (Docket No. [85](#), filed 06/18/2025).

Objection Deadline: July 24, 2025, at 4:00 P.M. (ET)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification numbers are as follows: VWS Holdco, Inc. (5412) and Shoosmith Bros., Inc. (6914). The Debtors' mailing address is P.O. Box 2770, Chesterfield, VA 23832.

² Amended agenda items appear in bold.



Responses Received: None. The objection deadline for Swift Creek Renewables, LLC has been extended to a date to be determined based on a new hearing date.

Status: This matter is adjourned to a hearing date to be determined.

2. Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [15](#), filed 06/02/2025).

Objection Deadline: July 24, 2025, at 4:00 P.M. (ET)

Responses Received:

- i. Limited Objection and Reservation of Rights in Response to Debtors Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 502 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing and (IV) Granting Related Relief (Docket No. [57](#), filed 06/09/2025).
- ii. Objection of Chesterfield County, Virginia, to Debtor-in-Possession Financing Motion (Docket No. [189](#), filed 07/24/2025).
- iii. Joinder of the Virginia Department of Environmental Quality to the Objection of Chesterfield County, Virginia to Debtor-in-Possession Financing Motion (Docket No. [190](#), filed 07/24/2025).
- iv. Joinder of Evergreen National Indemnity Company to Objection of Chesterfield County, Virginia to Debtor-in-Possession Financing Motion (Docket No. [191](#), filed 07/24/2025).
- v. Limited Objection and Reservation of Rights of SCS Engineers to Debtors' DIP Motion (Docket No. [192](#), filed 07/24/2025).
- vi. Objection of the Official Committee of Unsecured Creditors to the Debtors Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362,

363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief (Docket No. [193](#), filed 07/24/2025).

- vii. Objection Objectors' Objection to Entry of a Final Order Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [201](#), filed 07/24/2025).

Related Pleadings:

- i. Declaration of Steven Agran in Support of Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 AND 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [16](#), filed 06/02/2025).
- i. Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [42](#), filed 06/04/2025).
- ii. Second Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [146](#), Filed 07/02/2025).

- iii. Notice of Final Hearing on Debtors Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 And 9014 of the Federal Rules Of Bankruptcy Procedure (I) Authorizing The Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [147](#), filed 07/03/2025).

Status: This matter is adjourned until further notice.

MATTERS GOING FORWARD:

3. Application of the Official Committee of Unsecured Creditors of VWS Holdco, Inc. *et al.* for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel Effective as of June 16, 2025 (Docket No. [156](#), filed 07/10/2025).

Objection Deadline: June 24, 2025, at 4:00 P.M. (ET)

Responses Received: None.

Related Pleadings: None

Status: This matter is going forward.

4. Debtors Motion to Convert these Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code (Docket No. [194](#), filed 07/24/2025).

Objection Deadline: July 30, 2025 at 12:00 P.M. (ET)

Responses Received: None

Related Pleadings:

- i. Motion to Shorten Notice and Objection Periods Regarding Debtors' Motion to Convert these Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code (Docket No [196](#), filed 07/24/2025).
- ii. Declaration of Steven F. Agran in Support of Debtors' Motion to Convert these Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code (Docket No. [197](#), filed 07/24/2025).

- iii. Order Shortening Notice and Objection Periods Regarding Debtors' Motion to Convert these Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code (Docket No. [199](#), filed 07/24/2025).
- iv. Notice of Hearing on Debtors' Motion to Convert these Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code (Docket No. [205](#), filed 07/25/2025)

Status: This matter is going forward.

- 5. Joint Motion of Chesterfield County, Virginia, and the Virginia Department of Environmental Quality to Transfer Venue to the United States Bankruptcy Court for the Eastern District of Virginia (Docket No. [198](#), filed 07/24/2025).

Objection Deadline: July 30, 2025, at 12:00 P.M. (ET)

Responses Received:

- i. **Debtors' Response to the Joint Motion of Chesterfield County, Virginia, and the Virginia Department of Environmental Quality to Transfer Venue to the United States Court for the Eastern District of Virginia (Docket No. [218](#), filed 07/30/2025).**

Related Pleadings:

- i. Joint Motion to Shorten Joint Motion to Shorten Notice of Hearing on the Joint Motion of Chesterfield County, VA and the Virginia Department of Environmental Quality to Transfer Venue to the United States Bankruptcy Court for the Eastern District of Virginia (Docket No. [200](#), filed 07/24/2025).
- ii. Order Granting Joint Motion to Shorten Notice of Hearing on the Joint Motion of Chesterfield County, VA and the Virginia Department of Environmental Quality to Transfer Venue to the United States Bankruptcy Court for the Eastern District of Virginia (Docket No. [202](#), filed 07/24/2025).
- iii. Notice of Hearing Regarding Joint Motion of Chesterfield County, VA and the Virginia Department of Environmental Quality to Transfer Venue to the United States Bankruptcy Court for the Eastern District of Virginia (Docket No. [203](#), filed 07/25/25).

Status: This matter is going forward.

- 6. Debtors' Witness List for Hearing Scheduled for July 31, 2025, at 1:00 p.m. (ET) (Docket No. [212](#), filed 07/29/25).

Dated: July 30, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Richard W. Riley

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